

# SPIVAKLIPTON<sub>LLP</sub>

ATTORNEYS AT LAW

Nicholas J. Johnson  
njohnson@spivaklipton.com  
1040 6th Avenue, 20th Floor  
New York, NY 10018  
T 212.765.2100  
F 212.765.8954  
spivaklipton.com

May 16, 2023

**Via ECF**

The Honorable Lewis J. Liman  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1620  
New York, NY 10007

Re: **Trustees of the Equity-League Pension, Health, and 401(k) Trust Funds v.  
Paradise Square Production Services Inc. and Bernard Abrams  
Case No. 1:23-cv-00933 (LJL)**

---

Dear Judge Liman:

This firm represents Plaintiffs in the above-referenced case. Plaintiffs write pursuant to Paragraph 1(D) of Your Honor's Individual Practices in Civil Cases to request a 5-week extension from May 19, 2023 to June 23, 2023 of the deadline to file a motion for default judgment.

Plaintiffs request this extension because Plaintiffs expect to receive a payment in the coming weeks from a bond posted by Defendants for the amount of the delinquent contributions sought in this lawsuit. While it is anticipated that the payment will be received within the next few weeks, the timeline has not been confirmed, and Plaintiffs' counsel will be out of the country on vacation from June 8-18. Accordingly, a deadline of June 23 should allow sufficient time for Plaintiffs to receive the payment, or for Plaintiffs' counsel to prepare the motion papers if necessary.

This is the first request for an extension of this deadline. Plaintiffs have not conferred with Defendants about this request because Defendants have not appeared in this action. The parties do not currently have a scheduled appearance before the Court.

Respectfully submitted,


SPIVAK LIPTON LLP



Nicholas J. Johnson  
*Counsel for Plaintiffs*

Plaintiff's motion for an extension is GRANTED. Plaintiff shall file and serve its motion for a default judgment on or before June 23, 2023. Any opposition to the motion will be due by July 7, 2023. The Court will hear the motion for a default judgment by telephonic conference on July 14, 2023, at 11:00 a.m. The parties are directed to dial into the Court's teleconference number at 888-251-2909, Access Code 2123101, and follow the necessary prompts. Plaintiff's notice of motion shall contain this information.

SO ORDERED.



LEWIS J. LIMAN  
United States District Judge

5/17/2023